

IT Program Assessment

CBP - Automated Commercial Environment / International Trade Data System (ACE / ITDS)

Review

The DHS CIO conducted a comprehensive program review of the CBP Automated Commercial Environment International Trade Data System (ACE/ITIDS) project during September 2011. Program review observations include the following:

The CBP ACE/ITDS program will form the one system that provides a single window for CBP to interact, manage, and oversee import and export data, perform custodial revenue management and support enforcement systems for end to end visibility of the entire trade life-cycle. In addition, the program has reduced Government and private sector costs by eliminating unnecessary paperwork and enabling electronic processing of manifests, entry, and other trade documentation.

The program has accomplished a great deal since the FY2010 assessment, including:

- The ACE project successfully completed the development of the Electronic-Manifest for Rail and Sea (M1) software and deployed the production software on 27 August for operational test and evaluation (OT&E), which will run through calendar year 2011.
- ACE M1 achieved better testing effectiveness as demonstrated during system integration and user acceptance tests. This was facilitated by using a federalized staff of technical and business subject matter experts (SMEs) and improved testing procedures to ensure that what is produced meets the business need
- ACE M1 completed all but one of the action items from a previous Program Assessment and Design Review and will close out the last action item with the completion of OT&E
- The Cargo Systems Program Office, which manages ACE/ITIDS has reorganized to better focus management attention to the ACE/ITIDS efforts
 - Established the ACE Business Office (ABO) within the Office of International Trade (OT) to ensure stakeholder engagement in development, review and approval of system requirements
 - Restructured ACE governance to further strengthen program oversight, provide for Departmental visibility, and ensure agency-wide collaboration
 - Expanded the ACE/ITIDS Executive Steering Committee (ESC) to include DHS participation and to ensure active and frequent engagement with DHS Science and Technology, DHS Program Accountability and Risk Management (PARM), and the DHS Office of the Chief Information Officer (OCIO) organizations

- Developed a new acquisition strategy introducing more competition rather than using a single development contractor, an incremental development model and improved internal controls for effective contractor oversight

The ACE is also faced with risks, including:

- If the Automated Commercial System (ACS) legacy systems are not retired as scheduled, then the associated O&M costs (due to technical and skill set obsolescence) will consume product development resources and limit modernization opportunities
- If the project's FY 2012 and FY 2013 budgets are not increased, then there will be insufficient funds to develop remaining ACE capabilities

Mitigation Strategy

The ACE program has identified approaches to developing risk mitigation plans but has not actually developed the plan. It is performing an assessment to determine alternative technical strategies to retiring the legacy systems. And it is exploring feasible development options and requesting additional development dollars for the remaining ACE capabilities.

Assessment

The ACE/ITIDS Program has made significant advancements during the past year towards deploying much needed services to CBP's governance of the important import/export business. Continuing, the CBP Cargo Systems Program Office has initiated several management initiatives to improve overall program performance. The Program Manager is also continuing improvements to migrate the program to a Services-Oriented Architecture, improve contract management and interfaces, as well as improve the method of calculating earned value management to better reflect contract performance. ACE was successful in improving the program office interface with the M1 prime contractor, and getting the Electronic-Manifest for Rail and Sea (M1) Project re-baselined and back on schedule with sufficient funding. The ACE M1 production release was accomplished on 27 August and is now in OT&E. However, as noted above two significant risks remain, which are not yet mitigated. As mitigation strategies continue to be developed, the CIO will continue to participate in monitoring program progress. The CIO assesses the CBP ACE/ITIDS program as Level 3 – Medium Risk.

Score: 3